

BEFORE THE WASHINGTON STATE UTILITIES
AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

MURREY'S DISPOSAL COMPANY, INC.
d/b/a OLYMPIC DISPOSAL,

Respondent.

Docket No. TG-230778

DECLARATION OF JOE WONDERLICK
IN OPPOSITION TO STAFF'S MOTION
FOR LEAVE TO FILE REVISED
TESTIMONY

1 I, Joseph Wonderlick, under perjury of the laws of the State of Washington state as follows:
2 I am over the age of 18, a citizen of the United States and the State of Oregon and competent to
act as a witness in this matter.
3 We ("the Company" or "Olympic") received the Staff Motion to Revise Testimony in the late
afternoon Tuesday, June 4, six days after receiving Staff's Response Testimony to the
Company's case filed March 19, 2024, almost two and a half months previously.
4 Until we received that Motion, at no time in the numerous exchanges and interactions with Staff since our
original filing in September, 2023, were we informed by Mr. Sharbono or any other staff member that
Staff was contesting legal fee expenses, despite responding to numerous Data Requests about legal
expenses sought to be recovered in this general rate case.
5 In its new Motion, Staff points solely to the supposed convenience and sufficiency of time in defending
granting of its late-filed and reformulated position here.
6 Not only do we disagree with their conscious minimization of the timing impacts of this new procedural
move, but we would also allude to the substantive and detrimental impacts their surprising about-face
involves.

7 Indeed, by the afternoon of June 4, we had already had a virtual meeting with our outside expert, Mr. Branko Terzic, to assign additional topics for Rebuttal and outlined the points we intended him to address having then had almost a week to digest Staff's Response Testimony and numerous Exhibits. During that meeting, we noted various response items to our case in chief for which Staff had not advocated adjustment, including ironically, legal expenses.

8 In that meeting, we also addressed the rather urgent need to craft Data Requests for Staff and alluded to the very compressed time period for responses and the likely incorporation of some of those responses in our formal Rebuttal Testimony. As a consequence, our initial additional set of Data Requests were served the next day on Staff, tied to their Response Testimony of May 29.

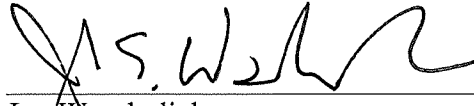
9 The Staff's Motion not only truncates that schedule compression further, but also raises the prospect of additional expert testimony, assuming a requisite witness could be identified, qualified to address that new topic and/or an assessment of whether any current witnesses might be qualified and commissioned to credibly respond to the new topic.

10 Thus, it is not just a question of accommodation of time intervals that our attached Opposition Response points out, it is also a question of considerable additional burdens being imposed on our presentation not only in the context of time, but also in the development of new testimonial lines not to mention expense, all of which incrementally add to our proof burden as rate case proponents.

11 We thus ask the Commission carefully weigh and examine this eleventh-hour position change as an element of due process and fundamental fairness at this pivotal stage in the case where the moving party offers absolutely no reason for the Motion, other than a "no harm, no foul" rendition of the case calendar.

12 Receiving this material change in Staff's position on the sixth day of a 31 calendar day response cycle is material in its impact on the formulation and organization of our Rebuttal case. It smacks of a rather desperate attempt to belatedly leave no stone unturned to broadly erode the revised approximate 12.6% revenue requirement increase sought in our first general rate case filing in 13 years.

Dated this 11th day of June, 2024.



Joe Wonderlick